

ALTERNATE DELIVERY OF PRESCRIPTIONS IN VIRGINIA
Pharmacy to Physician Type of Delivery

Reference: §54.1-3420.2 of the Code of Virginia, 18 VAC 110-20-275 of the Regulations of the Virginia Board of Pharmacy

The following is an example of some of the requirements for a Pilot Program approved by the Board to deliver prescriptions to an alternate location which was a physician licensed to practice pharmacy. These requirements formed the basis for the Emergency Regulations.

18 VAC 110-20-275. Delivery of dispensed prescriptions.

- C. Delivery to a practitioner of the healing arts licensed by the board to practice pharmacy or to sell controlled substances or other authorized person or entity holding a controlled substances registration authorized for this purpose.
 - 1. A prescription may be delivered by a pharmacy to the office of such a practitioner or other authorized person provided there is written contract or agreement between the two parties describing the procedures for such a delivery system and the responsibilities of each party.
 - 2. Each pharmacy using this delivery system shall maintain a policy and procedure manual that includes the following information:
 - a. Procedure for tracking and assuring security, accountability, integrity, and accuracy of delivery for the dispensed prescription from the time it leaves the pharmacy until it is handed to the patient or agent of the patient;
- Example:
 - The pharmacy will prepare a log of all the prescriptions. The employee delivering the prescriptions will sign this log. All of the prescriptions prepared for delivery and the signed log will be placed in a sealed tote/container prior to the employee leaving the pharmacy.
 - The agent at the receiving location will sign for receipt of the sealed container, then open the sealed container and check the prescriptions against the delivery log to insure that all prescriptions have been received and sign the log as being complete. The delivered prescriptions shall be stored in accordance with law and regulations.
 - Patients picking up their prescription(s) will sign the log indicating receipt of the prescription.

b. Procedure for providing counseling;

➤ Example: The prescriptions for a patient will be placed in a tamper-resistant bag with the Medi-Span Patient Information Leaflet for each prescription and a written offer for counseling by a pharmacist available by a toll free phone number to include the hours of operation for the pharmacy when counseling may be obtained. A label identifying the patient will be placed on the outside of the bag.

c. Procedure and recordkeeping for return of any prescription medications not delivered to the patient;

➤ Example: Completed logs are to be returned to the originating pharmacy within 14 days, and maintained in chronological order for a period of 2 years. Any prescriptions not picked up within 14 days are to be returned to the originating pharmacy in a sealed tote/container.

d. The procedure for assuring confidentiality of patient information; and

➤ Example: The only personnel handling the prescriptions will be employees of the pharmacy or employees of the permitted physician who already have access to these patients' medical records.

e. The procedure for informing the patient and obtaining consent if required by law for using such a delivery process.

➤ Example: A form explaining the service and explicitly requesting the patient's consent to participate in the service. (Not in pilot)

3. Prescriptions waiting to be picked up by a patient at the alternate site shall be stored in accordance with 18 VAC 110-20-710.

Other notes:

➤ Copies of forms to be utilized should be included in the policy and procedure manual.

➤ Description of supplies used to deliver prescriptions should be included in the policy and procedure manual.